

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

PATRICIA A. TRAVERS,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:12-cv-617
)	
CELLCO PARTNERSHIP d/b/a)	Judge Campbell
VERIZON WIRELESS,)	Magistrate Judge Bryant
)	
Defendant.)	Jury Demand

DECLARATION OF KIMBERLY GIBSON HARRIS

Declarant, Kimberly Gibson Harris, under penalty of perjury, states as follows:

1. I am over eighteen years of age, and I make this Declaration based upon my own personal knowledge.
2. I am currently an Operations Manager for Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless") in its Franklin, Tennessee office.
3. Verizon Wireless is a nationwide wireless service provider with retail stores throughout the country. In 2009 and 2010, I was a Manager in the Continuity Marketing Operations ("CMO") Department for Verizon Wireless in Franklin, Tennessee.
4. On June 21, 2010, Administrative Performance Supervisor Minyarn Pratt and I met with Patricia Travers to inform her of her discharge from Verizon Wireless. I was not Ms. Travers's manager, but I informed her of the discharge decision because her manager, Denise Gowler, was out of the business at that time.
5. The only information I had regarding the reasons for Ms. Travers's termination was contained in the South Area Termination Request Form, which was completed for Ms. Travers.

Based on the information contained in that document, I informed her that her employment was being terminated for integrity because of repeated violations of the Code of Business Conduct.

6. I did not mention or discuss Ms. Travers's attendance, health, or any leaves of absence during the termination meeting.

7. I did not make the recommendation or decision to discharge Ms. Travers.

I declare under penalty of perjury that the foregoing is true and correct.

This 20th day of May, 2013.

Kimberly Gibson-Harris